

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

CASE NUMBER: AW-09-CR0158

ANGELA SAMANTHA BENTOLILA

CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant, Angela Samantha Bentolila, by and through counsel, Teresa Whalen, Esquire, and hereby requests a modification of conditions of release with the consent of the United States of America. In support of this request, the Defendant states the following:

1. On February 5, 2009, the Honorable William Connelly, United States Magistrate Judge, ordered conditions of release as follows:

(7)(c) abide by the following restrictions on his personal associations, place of abode, or travel: Reside with Mother, Mary Beth Bentolila at 10603 Vantage Court, Potomac, MD 20854 with electronic monitoring 24/7 lock down; Leave only for meetings with attorney, court and meetings with counsel with prior approval of Pre-trial Services.

2. Ms. Bentolila has abided by all conditions of release. Assistant United States Attorney Solette A. Magnelli has consented to the modification of terms of release to allow Ms. Bentolila to travel to and from the Department of Motor Vehicles (MVA) to register a car in her name for the purpose of traveling to and from school.

2. The Bentolila family has purchased a car with standard transmission so that Ms. Bentolila can use this car to travel to and from school. Pretrial Services has informed Ms. Bentolila that she is authorized to take lessons with a family member to

drive the car, but needs court permission to travel to the MVA to register the car in her name. In order to add this car to her current liability insurance, Ms. Bentolila must register the car in her name.

3. By consent, Ms. Bentolila requests the terms of her release be modified to allow her to travel to and from the MVA for the purpose of registering a vehicle in her name.

WHEREFORE the Defendant requests this Court modify the conditions of release as requested above and for such other relief as this Court deems just in this matter.

Respectfully Submitted,

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